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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91204603
Party	Defendant Mirza Juddani
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Submission	Motion to Amend Application
Filer's Name	Daniel F. Dovi
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Signature	/Daniel F. Dovi/
Date	05/31/2013
Attachments	Motion to Amend.PDF(39683 bytes )

UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD

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BOMBARDIER RECREATIONAL PRODUCTS, INC.,

Opposer and  
Counterclaim-Respondent,

Opposition No. 91204603  
Serial No. 79097186

v.

MIRZA JUDDANI,

Applicant and  
Counterclaim-Petitioner.

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**APPLICANT’S MOTION TO AMEND**  
**APPLICATION SERIAL NO. 79097186 WITH CONSENT**

The parties to this opposition proceeding have been engaged in settlement discussions, and, pursuant to such discussions, have entered into and executed a settlement agreement by which they have agreed to resolve and settle this opposition (the “Agreement”).

As part of the Agreement, the Applicant and Counterclaim-Petitioner, Mirza Juddani (“Juddani”), has agreed to file, with the consent of Bombardier Recreational Products, Inc., the Opposer and Counterclaim-Respondent (“BRP”), a motion requesting that the recitation of services in International Class 39 in application Ser. No. 79097186 be amended as follows (amendments to the description of record shown in bold, underlined text):

Advisory services relating to travel; agency services for arranging travel, namely, making reservations and bookings for transportation, travel, booking agencies; air travel services, namely, providing ticketing services for air travelers, air travel information services, providing reviews of air travel service providers; arrangement of travel, namely, arranging travel

tours; booking of seats for travel; booking of tickets for travel; computerized reservation services for travel, namely, online transportation reservation services, online travel ticket reservation services; consultancy for travel; holiday travel reservation services, namely, reservation and booking of seats for travel; information services relating to travel, namely, provision of travel information; issuing of tickets for travel, namely, arranging for the emergency replacement of airline tickets; itinerary travel advice services; organization of travel, namely, travel route planning, travel planning for special occasions; provision of information relating to travel; provision of tourist travel information; provision of travel information; provision of travel services from customer loyalty and frequent buyer schemes, namely, online computer databases in the field of travel information services; provision of travel services from frequent flyer schemes, namely, air transportation services featuring a frequent flyer bonus program; reservation of seats for travel; reservation services for booking seats for travel; reservation services for travel, namely, reservation of seats for travel, travel and tour ticket reservation services; seat reservation services for travel; services for the arranging of travel, namely, arranging travel tours; services for the booking of travel; ticket booking services for travel, namely, booking of airline tickets. tourist agency services for travelers, namely, reservation and booking of seats for travel; tourist travel reservation services, namely, booking of airline tickets; transport of travelers; travel advisory services; travel agents services for arranging travel, namely, arranging travel tours, arranging cruises, **all of the aforementioned services excluding travel services in the field of snowmobiles.**

Accordingly, pursuant to the Agreement and with BRP's consent, Juddani respectfully requests the Board to act on and approve the amendment to the Class 39 services as set forth above, and to enter the amended description into the application file and into the opposition record.

After the Board acts on and approves this motion to amend the application and accepts and enters the amended services description, the parties will proceed to file a joint motion to (i) dismiss the opposition without prejudice (by BRP), and (ii) dismiss the cancellation counterclaim made in the opposition without prejudice (by Juddani).

**WHEREFORE**, Juddani respectfully requests the Board to act on and approve the amendment to the Class 39 services set forth herein, and to enter the amended description into the application file and into the opposition record.

Dated: May 31, 2013

**HODGSON RUSS** LLP  
*Attorneys for Applicant*

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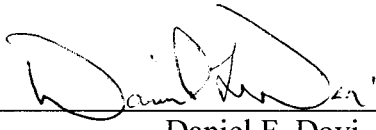
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CERTIFICATE OF SERVICE

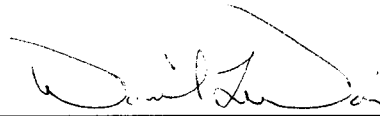
I, Daniel F. Dovi, hereby certify that a true and correct copy of this *Applicant's Motion to Amend Application Serial No. 79097186 with Consent* was served on May 31, 2013 by First Class Mail in an envelope addressed to:

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HOLLEY & MENKER, P.A.  
*Attorneys for Opposer and Counterclaim-Respondent*  
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\_\_\_\_\_  
Daniel F. Dovi

CERTIFICATE OF FILING

I, Daniel F. Dovi, hereby certify that this *Applicant's Motion to Amend Application Serial No. 79097186 with Consent* is being electronically filed with the Trademark Trial and Appeal Board on May 31, 2013.

A handwritten signature in black ink, appearing to read 'Daniel F. Dovi', is positioned above a horizontal line.

Daniel F. Dovi